



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

July 8, 2022

7/11/22

By ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

CASE Adj. to Sept 8, 2022
At 12:00 p.m. — time
Excluded through Sept. 8,
in the interest of justice,
to facilitate plea
discussions.

Re: *United States v. Valerio de Rodriguez*, 22 Cr. 255 (CM)

Dear Judge McMahon:

The Government writes to respectfully request to adjourn the status conference in the above-captioned matter, currently scheduled for July 14, 2022 at 12:00 p.m., for approximately thirty days or whatever would be most convenient for the Court.

As background, the defendant was charged by complaint on March 9, 2022. On May 3, 2022, the defendant waived prosecution by indictment and was arraigned on Information 22 Cr. 255 (CM). The parties are engaged in discussions regarding a potential pretrial resolution of this matter and do not expect that these discussions will conclude before July 14, 2022. Additionally, the undersigned AUSA is on trial next week before the Honorable Naomi Reice Buchwald. Accordingly, the Government respectfully requests an adjournment of approximately thirty days. The defendant consents to this request.

If the Government's request is granted, the Government respectfully requests, also with the defendant's consent, that the time between today and whichever date is set for the status conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), to allow the parties time to continue their discussions of a potential pretrial resolution. The Government respectfully submits that the proposed exclusion would be in the interest of justice.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/

Kaylan E. Lasky
Assistant United States Attorney
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cc: Aaron J. Mysliwiec, Esq. (via ECF)

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